



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

LTG

*610 Federal Plaza
Central Islip, New York 11722*

October 23, 2019

UNDER SEAL

By ECF

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Krantz & Berman LLP
747 Third Avenue, 32nd Floor
New York, NY 10017

Alan M. Vinegrad, Esq.
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The New York Times Building
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New York, NY 10018-1405

Re: United States v. McPartland et ano.
Criminal Docket No. 17-CR-587 (JMA)

Dear Counsel:

By this letter, and in anticipation of the November 5, 2019 Daubert Hearing, the government hereby makes the following requests pursuant to FRCP 16(b)(1)(B) and (C) and Title 18 USC § 3500.

Please provide the following information by October 30, 2019:

1. All opinions Dr. Jacobs will testify to, as well as the basis and reasons for the opinions held.
2. The data or facts Dr. Jacobs considered when forming his opinion.
3. Disclosure of any exhibits Dr. Jacobs intends to use to summarize or support his opinions.
4. The qualifications of Dr. Jacobs, including a list of all publications he has authored in the past ten years.
5. A list of cases in which Dr. Jacobs provided deposition testimony or trial testimony during the past four years.

6. A statement regarding Dr. Jacobs's compensation for the review and evaluation of the evidence, as well as his testimony in the case.
7. The date of the first contact or consultation with Dr. Jacobs.
8. The dates of all subsequent contacts or consultations with Dr. Jacobs.
9. Any and all notes of any interview/prep sessions with Dr. Jacobs either by the attorneys or investigators or any other member of the defense team.
10. Any and all email communication or other written communication between anyone on the defense team, including attorneys, and Dr. Jacobs.
11. Any expert report or reports, including draft reports, prepared by Dr. Jacobs.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Lara Treinis Gatz
Nicole Boeckmann
Justina L. Geraci
Michael R. Maffei
Assistant U.S. Attorneys

cc. The Honorable Joan M. Azrack